

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT

I. HEADING

Date: May 10, 2005
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Subject: Sweet Kleen Laundry - 760 Kensington Avenue, Buffalo, NY. Inactive commercial dry cleaner. Buildings on-site contain asbestos, drums of various cleaning and maintenance chemicals, perchloroethylene contaminated soils beneath buildings.

POLREP NO: One (1)

II. BACKGROUND

SITE/SPILL NO.: 02UQ
RESPONSE AUTHORITY: CERCLA/SARA
NPL STATUS: Non-NPL
RESPONSE TYPE: Emergency
CERCLIS ID: NYD013771217.
REMOVAL START DATE: May 9, 2005
COMPLETION DATE: N/A
INCIDENT CATEGORY: Removal Action

III. RESPONSE INFORMATION

A. Situation

The Site is the location of the former Sweet Kleen Laundry that was in operation from 1925 to 1993, when operations ceased. The laundry was commercial in scale and primarily provided industrial laundering and dry cleaning services. No prior tenants to Sweet Kleen existed at the Site. The City of Buffalo is the current property owner, acquiring the Site in November 2002 through the In Rem process of tax foreclosure. Two adjacent buildings have been excised from

the original site buildings, prior to the City of Buffalo acquiring the buildings through the in-rem process. At this time, it is undetermined if these buildings were an active part of the dry cleaning operations.

The Site is located in a mixed commercial and residential area. The Site is approximately ½ acre in size and hazardous substances and asbestos are contained within the on-Site buildings. The Site building cover most of the Site property and are interconnected via doorways and supporting structures. These interconnected buildings include dry cleaning and laundry operation areas, boiler and electrical rooms, warehouse space, retail space, and wholesale shipping and receiving areas. The Site also contains a 100 foot brick chimney suspected to have been used for incineration of laundry waste and/or boiler venting, and a 60 foot high water tower, constructed of wood and steel are also at the Site.

For identification of the Site assessment, the following rooms and buildings were identified:

- Room 1 - Location of dry cleaning operations and access to outdoor drum storage. Approximately 100 linear feet of asbestos insulation falling from pipes. Location of tetrachloroethylene found beneath flooring.
- Room 2 - Corridor connecting pipes between Room 1 and Room 3. Asbestos coated pipes and pipe insulation on floor. Approximately 100 linear feet of pipe insulation in room.
- Room 3 - Location of laundry machines, electrical transformers, completely collapsed roofing and approximately 400 linear feet of asbestos insulation falling off pipes. Room 3 is adjacent to warehouse space.
- Room 4 - Shipping area containing approximately 300 linear feet of asbestos insulation falling from pipes, roof is partially collapsed and in poor condition.
- Room 5- Offices containing laboratory chemicals of paints and caustic detergents. Interconnected with Site buildings.
- Boiler Room- Boilers and compressors in room adjacent to Room 4. Approximately 100 linear feet of asbestos pie insulation in poor condition.
- Chimney - 100 foot high brick chimney used for boiler room and for possible incineration of laundry scraps and boiler venting. An estimated 100 cubic yards of ash and residue contains tetrachloroethylene, arsenic up to 184ppm and lead up to 2160ppm.

The Site is bordered by Kensington Avenue to the south, Liberty Avenue to the east, Federal Avenue to west, and residences and businesses adjacent to the Site to the south. Pedestrian traffic is prevalent on the southern boundary of the Site, which is immediately adjacent to Kensington Avenue to the north.

Within 1/10 mile radius of the Site, over 50 homes are situated with a population estimated at 200. Within a 1/4 mile radius of the Site, over 100 homes are located with an estimated population of 400. Approximately 6 businesses are within 1/10 mile of the Site.

On October 29, 2003, the City of Buffalo requested that EPA evaluate the Sweet Kleen Site and consider the Site for a removal action. The City of Buffalo is a U.S. Environmental Protection Agency (EPA) Brownfields grant recipient, and the City made this request for assistance to place the property into productive use. In the referral request, the City of Buffalo provided the EPA with an overview of the building contents, and results from asbestos samples taken by the City from within the Site building.

As a result of this referral request, on December 16 and 17, 2003, EPA conducted an expedited removal assessment (ERA) at the Site with EPA's Removal Support Team Contractor (RST), EPA's Environmental Response Team (EPA-ERT), and representatives of the New York State Department of Environmental Conservation (NYSDEC). Results of this ERA identified the presence of hazardous substances in drums located at the Site, and in soil beneath dry cleaning units within the Site building. In addition, the ERA also documented the presence of asbestos throughout the Site buildings.

During the ERA, EPA confirmed the presence of the following: over 100 small containers of paint-related materials and corrosive detergents in the Site offices; 9 drums of which 2 contained tetrachloroethylene; 4 drums that were inaccessible due to building conditions; over 1,000 linear feet of asbestos piping (approximately 3" to 6" in diameter) in deteriorated condition in collapsed buildings; over 500 cubic yards of asbestos contaminated materials (ACM) and debris within the collapsed buildings on-Site; 4 electrical transformers containing unknown oil contents; 1 suspected underground storage tank containing unknown materials; and an estimated 200 cubic yards of tetrachloroethylene, arsenic, and lead contaminated ash in the 100 foot high chimney on-Site. EPA also identified an unknown amount of tetrachloroethylene contaminated soils beneath dry cleaning equipment in Site buildings.

The NYSDEC referred the Site to EPA in a letter dated March 15, 2004. In the referral, the NYSDEC requested that EPA identify and dispose of hazardous wastes at the site.

Proposed Actions

The following activities are proposed to address the immediate threats to human health and the environment posed by hazardous substances, or pollutants, or contaminants present at the Site.

- a. Stabilization - All containers that are open or of questionable integrity will be over-packed or transferred into new containers. Containers will be placed in compatible waste groups and removed from areas containing asbestos.
- b. Sampling - All containers, transformers, soil contamination areas, and UST will be sampled for disposal analysis parameters. Where possible, composite samples will be taken to reduce the total amount of samples analyzed. Areas of asbestos contamination will be sampled to confirm and/or delineate the presence of asbestos in Site debris.
- c. Analysis - All samples will be evaluated for compatibility. The samples will be analyzed for disposal parameters, anticipated to be the full toxicity characteristic leaching procedure (TCLP) analysis.

- d. Disposal - Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-Site disposal facilities in compliance with EPA's Off-Site Disposal Rule.
- e. Asbestos Abatement - Some of the areas at the Site which contain drums and other containers of hazardous substances are situated in highly contaminated asbestos areas. During the stabilization and sampling phase, areas that contain the greatest concentrations of asbestos will be addressed prior to demolition actions. An asbestos abatement contractor will abate the asbestos from these areas. Once these areas are abated, workers will proceed with hazardous substance stabilization, sampling and disposal.
- f. Demolition of Site buildings - The Site buildings are interconnected and are in a severe state of deterioration. The collapsed building sections have mixed with asbestos from piping and have caused asbestos-containing material (ACM) debris. The ACM debris is situated in collapsed building sections and requires removal. This can only be accomplished by building demolition. Stone and steel from the building demolition will be recycled and wood will be sent for landfill. ACM debris will be sent off-Site for landfill. In addition, demolition of Site buildings are required to further assess soil contamination beneath Room 1.
- g. Assessment of Soil Contamination - Once the buildings are removed, EPA will assess the extent and concentrations of soil contamination beneath Room 1 and adjacent Rooms. removed from beneath Room 1 and in areas where additional soil contamination may exist. These areas may include the scavenged transformer area and the UST.

B. Actions Taken

1. Site operations began on May 9, 2005. WRS mobilized to the site to prepare for the chimney dismantling operations. Prior to site mobilization, WRS secured bids for site operations and prepared a task-specific health and safety plan.
2. Due to the severe and dangerous conditions of the 100' chimney on-site, the chimney must be dismantled before cleanup operations can commence. Chimney dismantling operations began on May 10. International Chimney Corp. of Williamsville, NY is the subcontractor for the dismantling. The Chimney removal was completed on May 11.
3. EPA has prepared an information sheet about the site and has distributed the information to the surrounding residences, elected officials and media. The OSC and the EPA Public Information Office in Niagara Falls passed out the information sheets to the surrounding community and the OSC met with the residents on Federal Avenue and all of the surrounding businesses. A media availability session was held on May 11.
4. The OSC met with the local Buffalo Council Member and was invited to speak on a radio talk show and meet the community at the monthly breakfast held in the community.
5. Full site mobilization is scheduled for the week of May 23. Trailers and supporting infrastructure will be completed at that time.

C. Future Actions

1. Cleanup operations will begin the week of May 23. The cleanup contractor will initially make a building entry and abate the asbestos readily accessible. Upon completion of the abatement, the buildings will be dismantled, containers will be accessed and consolidated into a centralized location and further evaluated.

D. Key Issues

None.

IV. COST INFORMATION: As of 05/11/05

Site Ceiling as of 05/11/05			
	Total Ceiling	Costs to Date	Amount Remaining
WRS	\$ 616,000	\$ 25,000	\$ 591,000
RST (Weston Solutions)	\$ 60,000	\$ 2,000	\$ 58,000
EPA	\$ 100,000	\$ 3,000	\$ 97,000
Totals	\$ 776,000	\$ 30,000	\$ 746,000

The costs above reflect the amounts obligated to the project at this time but do not reflect the entire site ceiling amounts. If additional funding is necessary, the totals will be adjusted accordingly.

The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data, which the OSC must rely upon, may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.